

A. 83



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 1630453004 -- St. Clair County
East St. Louis/Pfizer, Inc.
Permit No. 1983-3-OP

EPA Region 5 Records Ctr.



390917

September 18, 1986

Jeffrey C. Carlton, P.E.
Pfizer Pigments, Inc.
2001 Lynch Avenue
East St. Louis, IL 62205

Dear Mr. Carlton:

This is in response to your recent letter in which you ask if direct use of spent pickle liquor from steel operations as a substitute for raw material in your manufacturing operation is considered to be hazardous waste treatment. If the spent pickle liquor is directly used without intermediate reclamation as a substitute for a raw material in a manufacturing process, the activity qualifies as use/reuse. Materials that are used/reused are not solid wastes and are not subject to RCRA Subtitle C regulations unless they are speculatively accumulated, used in a manner constituting disposal or burned as a fuel.

Because Pfizer, Inc. has an IEPA Division of Land Pollution Control permit to operate a spent pickle liquor treatment facility, you may receive spent pickle liquor for treatment from any generator provided that you obtain supplemental waste stream permits and the spent pickle liquor is transported using the Agency special waste manifest system.

Apparently, Pfizer, Inc. has the option of using spent pickle liquor directly, without reclamation, in which case it is not a solid waste; or receiving spent pickle liquor for treatment in your facility, in which case it is a solid waste, a RCRA hazardous waste and an Illinois special waste.

If you have further questions, please call me at the above phone number.

Sincerely,

Eugene P. Theios, Manager
Disposal Alternatives Unit
Permit Section
Division of Land Pollution Control

EPT:tk:5/5/36

cc: Division File
Southern Region

PAGE 1-A

FACILITY PART A WITHDRAWAL
PFIZER PIGMENTS, INC.

DESCRIPTION OF TREATMENT (T04)

Pfizer purchases spent pickle liquor (K062) from steel operations to use as a substitute for a raw material (virgin sulfuric and hydrochloric acid) in the manufacture of iron oxide products.

The manufacturing process begins by reacting scrap iron with either the spent pickle liquor or virgin acid in large, heated reactor tanks (neutralizers). The acid is neutralized during the reaction with the iron, which produces either a ferrous sulfate solution or a ferrous chloride solution. These neutralized solutions are then transferred to other tanks where the remaining solids settle. The clear solutions are then reacted to allow the iron salts to precipitate as iron oxide. The oxide then passes through several additional steps to produce our final products.

Pfizer's use of the spent pickle liquor as a substitute for raw acid is described in greater detail in the attached correspondence between Pfizer and IEPA.

FACILITY PART A WITHDRAWAL REQUEST FORM

Complete and Submit to:

Illinois Environmental Protection Agency
Attn: Carrie Agrall
Division of Land Pollution Control #24
Permit Section
2200 Churchill Road
Springfield, IL 62706

Date: 01 / 29 / 88

Facility Name: Pfizer Inc.
(As it appears on the Federal Printout or on the accepted Part A)

Federal ID Number: I L D 0 0 6 3 1 7 1 1 9

State ID Number: 1 6 3 0 4 5 0 0 3 4

Location of Facility: 2001 Lynch Avenue
(Street Address)

<u>East St. Louis</u> (City)	<u>62205</u> (Zip Code)	<u>St. Clair</u> (County)
Jeffrey C. Carlton, P.E.		
Contact Person & Phone #:	<u>Safety/Environmental Engineer</u> (Name and Title)	<u>(618) 271 - 4700</u>

A representative of our facility previously submitted a Part A RCRA Interim Status Permit Application indicating the handling of hazardous waste by the following process(es):

<u>Treatment</u>	<u>Storage</u>	<u>Disposal</u>
Tank T01 <u> </u>	Container (barrel, drum, etc.) S01 <u> </u>	Injection Well D79 <u> </u>
Surface Impoundment T02 <u> </u>	Tank S02 <u> X </u>	Landfill D80 <u> </u>
Incineration T03 <u> </u>	Waste Pile S03 <u> </u>	Land Application D81 <u> </u>
*Other T04 <u> X </u> (Specify Below)	Surface Impoundment S04 <u> </u>	Ocean Disposal D82 <u> </u>
* See attached page 1A		Surface Impoundment D83 <u> </u>

The Part A was filed in error for the following reason(s):

COMMENTS*

<input type="checkbox"/> A. Asbestos	_____
<input type="checkbox"/> B. Drum Recycling	_____
<input type="checkbox"/> C. Elementary Neutralization**	_____
<input type="checkbox"/> D. Elementary Neutralization and Wastewater Treatment Unit**	_____
<input type="checkbox"/> E. Exempted Waste	_____
<input type="checkbox"/> F. Non-Hazardous Waste	_____
<input type="checkbox"/> G. Pickle Liquor***	_____
<input type="checkbox"/> H. Protective Filer	(K062)
<input checked="" type="checkbox"/> J. Raw Materials	Spent pickle liquor is used as a substitute for a raw material (virgin sulfuric or hydrochloric acid) in the production of iron oxide materials. See attached correspondence between Pfizer and Illinois EPA.
<input type="checkbox"/> K. Recycling (Specify type of recycling, and exemption claimed)	_____
<input type="checkbox"/> M. Small Quantity Generator	_____
<input type="checkbox"/> N. Storage less than 90 days	_____
<input type="checkbox"/> P. Transfer Facility	_____
<input type="checkbox"/> Q. Transporter	_____
<input type="checkbox"/> R. Wastewater Treatment Unit**	_____
<input type="checkbox"/> S. Non-Existing Facility (Never Built)	_____
<input type="checkbox"/> T. Other	_____

Include copies of any supportive documents (i.e., waste analysis, manifests, amended Part A's, etc.) to substantiate non-regulated claim.

* Comment Section should be used to explain in detail the reason for claiming non-regulated status. If more than one reason is checked, each comment should reflect the alpha letter next to each explanation.

** Whenever a Treatment Exemption is claimed, the Comment Section should indicate what process generated the waste (i.e., plating operation, metal heat treating, etc.).

*** Other than spent pickle liquor generated by steel finishing operations of plants that produce iron and/or steel.

Based on the above information (check one):

- ☐ 1. Please withdraw the RCRA Part A Permit Application as our facility never treated, stored (more than 90 days) or disposed of hazardous waste since November 19, 1980 and is currently not regulated.
- ☐ 2. Please withdraw the RCRA Part A Permit Application as our facility is exempt from regulation.
- ☒ 3. # Please withdraw the RCRA Part A Permit Application and change the regulated status to:
- ☒ a. Generator
- ☐ b. Transporter

(If number 3 is checked, a new or subsequent 8700-12 (EPA Hazardous Waste Notification) may be required).


I am aware that should our facility treat, store, or dispose of
(i.e., transport, generate, treat, store or dispose of) any hazardous waste in the
future, we would be required to comply with the permitting
(i.e., notification and/or permitting) requirements of RCRA.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Roger E. Rader

Plant Manager

+(Name and Title - Date)

 1-29-88

+ (Signature must be in compliance with 702.126 (i.e., responsible corporate officer or designee, general partner or the proprietor, principal executive officer of an agency, etc.)

BB:tk:3/1/42(8/5/86)